

Kent Ries, Attorney at Law  
State Bar No. 16914050  
PO Box 3100  
Amarillo, Texas 79116  
(806) 242-7437  
(806) 242-7440 – Fax  
[kent@kentries.com](mailto:kent@kentries.com)

COUNSEL FOR TRUSTEE

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

<b>IN RE:</b>	§	
	§	
<b>MCCLAIN FEED YARD, INC., et al.,<sup>1</sup></b>	§	<b>CASE NO. 23-20084-RLJ-7</b>
	§	
	§	
<b>Debtors.</b>	§	<b>Jointly Administered</b>

**MOTION TO PAY ADMINSTRATIVE EXPENSES OF CANYON RIM CONSULTING,  
LLC**

TO THE HONORABLE ROBERT L. JONES, BANKRUPTCY JUDGE:

Comes now, Kent Ries, Trustee of the above referenced bankruptcy estate, and files this his Motion to Pay Administrative Expenses of Canyon Rim Consulting, LLC (“Canyon Rim”), and respectfully shows the Court as follows:

1. Debtors filed for relief under Chapter 7 of the United States Bankruptcy Code on April 28, 2023. Kent Ries was subsequently appointed and qualified to serve as the Trustee over the bankruptcy estate.

2. The Trustee found it necessary to employ Canyon Rim for computer consulting services in obtaining and investigating records and information of the Debtors, including copying hard drives and similar data storage from the Debtors’ computers and cell phones. On June 29, 2023, the Trustee filed his motion, pursuant to 11 U.S.C. § 327, to hire Canyon Rim. On July 6,

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<sup>1</sup> The Debtors in these Chapter 7 cases are: McClain Feed Yard, Inc. (Case No. 23-20084-RLJ), McClain Farms, Inc. (Case No. 23-20085-RLJ), and 7M Cattle Feeders, Inc. (Case No. 23-20086-RLJ)

2023, this Court signed its Order authorizing the Trustee to employ Canyon Rim for such services

3. The Trustee seeks approval to pay Canyon Rim for the services described in the three invoices attached hereto as Exhibit “A” and incorporated herein by reference for all purposes. The total amount charged by Canyon Rim is \$20,894.12. The Trustee has sufficient funds in the estate bank account to pay these expenses.

4. The Trustee attests that the services provided by Canyon Rim have been charged at the hourly rate disclosed in the Trustee’s motion to hire. Further, the Trustee attests that Canyon Rim performed all the services described in a timely and effective manner, including copying multiple hard drives and phones of the Debtors and its owner.

WHEREFORE, PREMISES CONSIDERED, Kent Ries, Trustee herein, respectfully prays for an Order of this Court allowing payment to Canyon Rim as described above, and for such other relief, at law or in equity, to which the Trustee may show himself justly entitled.

Respectfully submitted,

Kent Ries, Attorney at Law  
PO Box 3100  
Amarillo, Texas 79116  
(806) 242-7437

By: /s/ Kent Ries  
State Bar No. 1691450  
COUNSEL FOR TRUSTEE

**IMPORTANT NOTICE**

**NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT 205 SOUTHEAST FIFTH AVENUE, ROOM 133, AMARILLO, TEXAS 79101, BEFORE 4:30 P.M. ON SEPTEMBER 3, 2024, WHICH IS AT LEAST 21 DAYS FROM THE DATE OF SERVICE HEREOF.**

**ANY RESPONSE MUST BE IN WRITING AND FILED WITH THE CLERK, AND A COPY MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING WILL BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.**

**IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 13<sup>th</sup> day of August 2024, a true and correct copy of the above and foregoing Motion was sent via ECF or mailed by the 14<sup>th</sup> day of August 2024, in the United States mail, postage prepaid, to the parties listed below and on the attached mailing matrix.

/s/ Kent Ries

**Canyon Rim Consulting, LLC**

301 S Polk St Ste 815  
Amarillo, TX 79101 US  
+1 8063827320  
wfreeman@canyonrimconsulting.com



**INVOICE**

BILL TO  
Kent Ries  
The Estate of McClain Feed Yard Inc  
PO BOX 3100  
Amarillo, Texas 79116

INVOICE 1445  
DATE 08/22/2023  
TERMS Due on receipt  
DUE DATE 08/22/2023

DATE	DESCRIPTION	QTY	RATE	AMOUNT
	The Estate of McClain Feed Yard Inc:Data Backup			
	08/09/2023			
08/09/2023	Billable Hours:Hours Pick up equipment - Michael R Lewis	1:00	235.00	235.00
	08/18/2023			
08/18/2023	Billable Hours:Hours Pickup external drives, setup equipment and start data copy - Michael R Lewis	3:00	235.00	705.00
	SUBTOTAL - The Estate of McClain Feed Yard Inc:Data Backup			940.00
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	SUBTOTAL			940.00
	TAX			0.00
	TOTAL			940.00
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	BALANCE DUE			<b>\$940.00</b>

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**INVOICE**

**BILL TO**  
**Kent Ries**  
The Estate of McClain Feed Yard Inc  
PO BOX 3100  
Amarillo, Texas 79116

INVOICE 1467  
DATE 09/07/2023  
TERMS Due on receipt  
DUE DATE 09/07/2023

DATE	DESCRIPTION	QTY	RATE	AMOUNT
	The Estate of McClain Feed Yard Inc:Data Backup			
	08/21/2023			
08/21/2023	Billable Hours:Hours Copy data from optiplex to backup drive - Michael R Lewis	2:00	235.00	470.00
	08/22/2023			
08/22/2023	Billable Hours:Hours Data copy / backup - Michael R Lewis	7:00	235.00	1,645.00
	08/23/2023			
08/23/2023	Billable Hours:Hours Data copy - transfer from linux drives - Michael R Lewis	7:00	235.00	1,645.00
	08/24/2023			
08/24/2023	Billable Hours:Hours Data recovery /copy - Michael R Lewis	5:00	235.00	1,175.00
	08/25/2023			
08/25/2023	Billable Hours:Hours Data recovery/copy - Michael R Lewis	7:00	235.00	1,645.00
	08/28/2023			
08/28/2023	Billable Hours:Hours Password crack windows machines - Michael R Lewis	5:00	235.00	1,175.00
	08/29/2023			
08/29/2023	Billable Hours:Hours Data recovery and copy - Michael R Lewis	2:00	235.00	470.00
	08/31/2023			
08/31/2023	Billable Hours:Hours Data recovery and copy- iPhone - Michael R Lewis	8:00	235.00	1,880.00
	09/01/2023			
09/01/2023	Billable Hours:Hours Iphone data copy - Michael R Lewis	7:30	235.00	1,762.50
	SUBTOTAL - The Estate of McClain Feed Yard			11,867.50

Inc:Data Backup

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SUBTOTAL	11,867.50
TAX	0.00
TOTAL	11,867.50

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BALANCE DUE	<b>\$11,867.50</b>
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**Canyon Rim Consulting, LLC**

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Amarillo, TX 79101 US  
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wfreeman@canyonrimconsulting.com



**INVOICE**

**BILL TO**  
**Kent Ries**  
The Estate of McClain Feed Yard Inc  
PO BOX 3100  
Amarillo, Texas 79116

INVOICE 1483  
DATE 09/21/2023  
TERMS Due on receipt  
DUE DATE 09/21/2023

DATE		DESCRIPTION	QTY	RATE	AMOUNT
		The Estate of McClain Feed Yard Inc			
		09/13/2023			
09/13/2023	Other Services	Shipping Equipment	1	180.15	180.15
09/13/2023	Hardware:Hardware	3 external SSD harddrives for copying data - 2TB	3	167.99	503.97
		SUBTOTAL - The Estate of McClain Feed Yard Inc			684.12
		The Estate of McClain Feed Yard Inc:Data Backup			
		09/05/2023			
09/05/2023	Billable Hours:Hours	Copy data - setup redundant copies - Michael R Lewis	5:30	235.00	1,292.50
		09/06/2023			
09/06/2023	Billable Hours:Hours	File consolidation - Michael R Lewis	8:00	235.00	1,880.00
		09/07/2023			
09/07/2023	Billable Hours:Hours	File consolidation - Michael R Lewis	7:00	235.00	1,645.00
		09/08/2023			
09/08/2023	Billable Hours:Hours	Data copy - create external drive duplicates - Michael R Lewis	6:00	235.00	1,410.00
		09/12/2023			
09/12/2023	Billable Hours:Hours	Verify copies. Box up equipment - Michael R Lewis	3:00	235.00	705.00
		09/13/2023			
09/13/2023	Billable Hours:Hours	Work out shipping. Prep boxes - Michael R Lewis	2:00	235.00	470.00

SUBTOTAL - The Estate of 7,402.50  
McClain Feed Yard  
Inc:Data Backup

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SUBTOTAL 8,086.62

TAX 0.00

TOTAL 8,086.62

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BALANCE DUE **\$8,086.62**



**Canyon Rim Consulting, LLC**

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Amarillo, TX 79101 US  
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wfreeman@canyonrimconsulting.com



## Statement

**TO**

Kent Ries  
The Estate of McClain Feed Yard  
Inc  
PO BOX 3100  
Amarillo, Texas 79116

**STATEMENT NO.** 1047  
**DATE** 12/11/2023

DATE	DESCRIPTION	AMOUNT	RECEIVED
08/22/2023	Invoice #1445	940.00	0.00
09/07/2023	Invoice #1467	11,867.50	0.00
09/21/2023	Invoice #1483	8,086.62	0.00
10/02/2023	Invoice #1501	0.00	0.00
		<b>TOTAL AMOUNT</b>	<b>TOTAL RECEIVED</b>
		\$20,894.12	\$0.00